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*Attorneys for Plaintiffs Theresa Beiner and
Brandon Haubert in Beiner, et al. v. Facebook,
Inc., et al., No. 3:18-CV-1953*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

LAUREN PRICE, on behalf of herself and
all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC., and CAMBRIDGE
ANALYTICA, LLC

Defendants.

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CASE NO. 3:18-CV-01732-VC

**DECLARATION OF HANK BATES IN
SUPPORT OF PLAINTIFFS THERESA
BEINER AND BRANDON HAUBERT'S
NOTICE OF RELATED CASE AND
ADMINISTRATION MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED**

Action Filed: March 20, 2018

Under 28 U.S.C. § 1746, I, Hank Bates, declare as follows:

1. I am a partner with the law firm of Carney Bates & Pulliam, PLLC, counsel for Plaintiff Theresa Beiner and Brandon Haubert who filed a consumer class action complaint on March 29, 2018 in the United States District Court for the Northern District of California, in *Beiner, et al. v. Facebook, Inc., et al.*, No. 18-cv-1953 (“Beiner Action”). Pursuant to Civil Local Rule 7-11, I submit this declaration in support of Plaintiffs’ Administrative Motion to Consider Whether Cases Should Be Related. If called to testify as a witness, I could and would competently testify to the matters stated herein.

2. I have reviewed the complaints filed in *Price v. Facebook, Inc., et al.*, Case No. 3:18-cv-01732 (filed March 20, 2018) (“Price Action”), *Rubin v. Facebook, Inc., et al.*, Case No. 3:18-cv-01852 (filed March 26, 2018) (“Rubin Action”), *Gennock et al. v. Facebook, Inc., et al.*, Case No. 4:18-cv-01891 (filed March 27, 2018) (“Gennock Action”), *O’Kelly v. Facebook, Inc., et al.*, Case No. 3:18-cv-01915 (filed March 28, 2018) (“O’Kelly Action”), and *Haslinger v. Facebook, Inc., et al.*, Case No. 4:18-cv-01984 (filed March 30, 2018) (“Haslinger Action”). The cases appear to be related because they concern the same or similar parties, i.e., Facebook, Inc. (“Facebook”) and Cambridge Analytica, LLC (“Cambridge”), and arise from the same facts. Specifically the cases allege that Facebook’s user privacy and data security policies improperly allowed third parties to access the personal data of millions of Facebook users without their consent, which led to the recently revealed leak in 2015 by Cambridge, a data firm brought on by the Trump presidential campaign that improperly obtained the personal information of 50 million users, and used the information to target voters online before the U.S. election in 2016.

3. I was unable to obtain a stipulation signed by all parties or their counsel before filing this Administrative Motion. The Complaint in this action (Price) was filed on March 20, 2018, and a summons was issued as to defendants On March 22, 2018, (Dkt No. 11), however, no proof of service of the complaint has been filed and no counsel has yet appeared for defendants.

4. I declare under penalty of perjury that the foregoing is true and correct. Executed on April 2, 2018, as Little Rock, Arkansas.

s/ Hank Bates
Hank Bates